

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE: TESTOSTERONE REPLACEMENT THERAPY PRODUCTS LIABILITY LITIGATION	MDL No. 2545
This Document Relates to All Cases	Master Docket Case No. 1:14-cv-01748 Hon. Judge Matthew F. Kennelly

JOINT STATUS REPORT

In accordance with the Court’s instructions at the July 20, 2015 case management conference (“CMC”), the Plaintiffs’ Steering Committee (the “PSC”) and Defendants AbbVie Inc. and Abbott Laboratories (collectively, “AbbVie”) jointly submit this report on the status of the parties’ discussions regarding the schedule of AbbVie depositions commencing in October 2015 which addressed the following:

1. The PSC will provide AbbVie with an initial list of deposition witnesses next week. The list will not exceed 10 witnesses and will indicate which witnesses plaintiffs seek to depose in October.
2. Depositions will be scheduled so as to assure that the custodial files for the deponent can be produced and reviewed before the deposition and to help facilitate state-federal coordination. The parties will work with plaintiffs’ counsel in the state cases to resolve any issues regarding the order and durations of examination.
3. The issue of how depositions count toward the limit and/or how to mitigate against witnesses being deposed more than once has not been resolved. Both sides, however, are committed to reasonably coordinate with other state litigations to adequately address these issues.

4. The parties will continue to meet and confer regarding the production of custodial files. AbbVie re-raised its desire for a cap on custodial file productions, and made a further proposal in that regard. The parties will continue to meet and confer and, if agreement cannot be reached, AbbVie and the PSC will present any unresolved issues regarding custodial productions in advance of the next CMC.

Dated: July 23, 2015

Respectfully submitted,

/s/ Trent B. Miracle

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CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2015, the foregoing document was filed via the Court's CM/ECF system, which will automatically serve and send email notification of such filing to all registered attorneys of record.

/s/ Trent B. Miracle